

**EXHIBIT 3**

**Premo Declaration**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	
In re:	)	Case No. 12-12020 (MG)
	)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	)	Chapter 11
	)	
Debtors.	)	Jointly Administered
_____	)	

**DECLARATION OF GRANT A. PREMO CONCERNING RESCAP  
BORROWER CLAIMS TRUST'S OBJECTION TO CLAIM NO. 4834  
FILED BY TERRANCE P. GORMAN AND KAREN GORMAN**

I, Grant A. Premo, hereby declare as follows:

1. I am an attorney at the law firm of Bradley Arant Boult Cummings LLP (“**BABC**”). BABC maintains offices for the practice of law, among other locations, at 1819 Fifth Avenue North, Birmingham, Alabama 35203. I submit this declaration in support of the *ResCap Borrower Claims Trust's Objection to Proof of Claim No. 3695 Filed by Terrance P. Gorman and Karen Gorman* (the “**Objection**”).<sup>1</sup>

2. Attached hereto as Exhibit A is a copy of an *Order to Proceed with Notice of Foreclosure Sale and Foreclosure Sale* (the “**Order to Proceed**”) entered by the Collin County Court on April 24, 2009 in the First Foreclosure Proceeding, which was obtained at my request from the Collin County Court by a court document retrieval service.

3. Attached hereto as Exhibit B is a copy of an Order (the “**Order Granting Review**”) entered by the Collin Country Court on January 7, 2010 in the First Foreclosure Proceeding, which was obtained at my request from the Collin County Court by a court document retrieval service.

<sup>1</sup> Unless otherwise indicated herein, capitalized terms shall have the meanings ascribed to them in the Objection.

4. Attached hereto as Exhibit C is a copy of a petition (the “**Contested Foreclosure Petition**”) filed by Claimants on March 14, 2010 in the Contested Foreclosure Action, which was obtained at my request from the Collin County Court by a court document retrieval service.

5. Attached hereto as Exhibit D is a copy of the *Motion to Abate and Dismiss Rule 736 Proceedings* (the “**Motion to Abate**”) filed by Claimants on March 15, 2010 in the First Foreclosure Proceeding, which was obtained at my request from the Collin County Court by a court document retrieval service.

6. Attached hereto as Exhibit E is a copy of a complaint (the “**Complaint**”) filed by Claimants on January 17, 2012 in the State Court Action, which was obtained at my request from the Collin County Court by a court document retrieval service.

7. Attached hereto as Exhibit F is a copy of a notice (the “**Removal Notice**”) filed by Deutsche Bank, MERS and GMAC Mortgage on February 17, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

8. Attached hereto as Exhibit G is a copy of an amended complaint (the “**Amended Complaint**”) filed by Claimants on March 21, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

9. Attached hereto as Exhibit H is a copy of a motion to dismiss (the “**Motion to Dismiss**”) filed by Deutsche Bank, MERS and GMAC Mortgage on April 3, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

10. Attached hereto as Exhibit I is a copy of a response (the “**MTD Response**”) filed by Claimants on May 2, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

11. Attached hereto as Exhibit J is a copy of a reply (the “**MTD Reply**”) filed by Deutsche Bank, MERS, and GMAC Mortgage on May 21, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

12. Attached hereto as Exhibit K is a copy of a *Notice of Bankruptcy and Suggestion of Automatic Stay* (the “**Notice of Stay**”) filed by GMAC Mortgage on July 27, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

13. Attached hereto as Exhibit L is a copy of an order (the “**Stay Order**”) entered by the Texas Federal Court on October 12, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

14. Attached hereto as Exhibit M is a copy of a motion for summary judgment (the “**MSJ**”) filed by Deutsche Bank and MERS on December 7, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

15. Attached hereto as Exhibit N is a copy of a *Motion to Strike Defendants’ MSJ Evidence and Brief in Support Thereof* (the “**Motion to Strike**”) filed by Claimants on December 31, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

16. Attached hereto as Exhibit O is a copy of a response (the “**MSJ Response**”) filed by Claimants on December 31, 2012 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

17. Attached hereto as Exhibit P is a copy of a response (the “**MTS Response**”) filed by Deutsche Bank and MERS on January 11, 2013 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

18. Attached hereto as Exhibit Q is a copy of a reply (the “**MSJ Reply**”) filed by Deutsche Bank and MERS on January 11, 2013 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

19. Attached hereto as Exhibit R is a copy of a final pretrial order (the “**Joint Pretrial Order**”) filed by Claimants, Deutsche Bank and MERS on February 18, 2013 in the Federal Court Action, which was obtained from the electronic case docket of the Federal Court Action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 23, 2016

/s/ Grant A. Premo  
Grant A. Premo, Esq.